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11  
12 UNITED STATES DISTRICT COURT  
13 SOUTHERN DISTRICT OF CALIFORNIA  
14

15 HERRING NETWORKS, INC.,

16 Plaintiff,

17 v.

18 RACHEL MADDOW; COMCAST  
CORPORATION; NBCUNIVERSAL  
19 MEDIA, LLC; and MSNBC CABLE  
L.L.C.,

20 Defendants.  
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CASE NO. 19-cv-1713-BAS-AHG

**JOINT MOTION AND STIPULATION  
TO EXTEND DEFENDANTS' TIME  
TO RESPOND TO PLAINTIFF'S  
COMPLAINT**

Action Filed: September 9, 2019

Judge: Hon. Cynthia Bashant

1 TO THE COURT AND THE CLERK OF COURT, PLEASE TAKE NOTICE  
2 THAT Plaintiff Herring Networks, Inc. (“Plaintiff”) and Defendants Rachel Maddow,  
3 Comcast Corporation, NBCUniversal Media, LLC, and MSNBC Cable L.L.C.  
4 (“Defendants”) (together with Plaintiff, the “Parties”), by and through their respective  
5 counsel of record, hereby stipulate and agree as follows:

6 WHEREAS, Plaintiff filed its Complaint (Dkt. 1) in the above-captioned action  
7 on September 9, 2019;

8 WHEREAS, Defendants Comcast Corporation, NBCUniversal Media, LLC, and  
9 MSNBC Cable L.L.C. were served with the Complaint on September 12, 2019;

10 WHEREAS, Defendant Rachel Maddow was served with the Complaint on  
11 September 20, 2019;

12 WHEREAS, the Parties have stipulated to an extension of the deadline for all  
13 Defendants to answer, move, or otherwise respond to the Complaint up to and  
14 including October 21, 2019;

15 WHEREAS, the Parties have agreed to meet and confer pursuant to Rule 4.A. of  
16 this Court’s Standing Order for Civil Cases by October 8, 2019 regarding any motions  
17 Defendants intend to bring in response to the Complaint;

18 WHEREAS, Defendants reserve all rights and defenses and waive none;

19 WHEREAS, Local Civil Rule 7.2(b) permits the Parties to file this Stipulation as  
20 a joint motion;

21 WHEREAS, the stipulated extension would not affect any current deadlines  
22 already fixed by the Court;

23 NOW THEREFORE, the Parties hereby stipulate that Defendants shall have up  
24 to and including October 21, 2019, to answer, move, or otherwise respond to the  
25 Complaint.

26 \* \* \*

**IT IS SO STIPULATED.**

DATED: October 2, 2019

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Scott A. Edelman  
Scott A. Edelman

Attorneys for Defendants Rachel Maddow,  
Comcast Corporation, NBCUniversal  
Media, LLC, and MSNBC Cable L.L.C.

DATED: October 2, 2019

MILLER BARONDESS, LLP  
Louis R. Miller  
Amnon Z. Siegel

By: /s/ Amnon Z. Siegel  
Amnon Z. Siegel

Attorneys for Plaintiff Herring Networks,  
Inc.